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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

PETER VELASCO, *et al.*,

Plaintiffs,

v.

CHRYSLER GROUP LLC,

Defendant.

Case No. 2:13-cv-08080-DDP (VBKx)

FILED UNDER SEAL

**NOTICE OF MOTION AND MOTION
FOR PRELIMINARY INJUNCTION**

Date: October 20, 2014

Time: 10:00 a.m.

Judge: Honorable Dean D. Pregerson

Courtroom: 3

**NOTICE OF MOTION AND MOTION FOR PRELIMINARY INJUNCTION
NO. 2:13-cv-08080-DDP (VBKx)**

1 **PLEASE TAKE NOTICE** that on October 20, 2014, at 10:00 a.m., or as soon
2 thereafter as this matter may be heard, before the Honorable Dean D. Pregerson, in
3 Courtroom 3, 312 North Spring Street, Los Angeles, California, Plaintiffs will and hereby
4 do move for entry of a preliminary injunction requiring Chrysler to inform proposed class
5 members and its dealerships that: [REDACTED]

6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED] and may worsen
10 over time if the TIPM is not replaced.

11 Plaintiffs' motion is based on this notice of motion; the accompanying
12 memorandum; the declarations of David Stein and Rachel A. Naor, and accompanying
13 attachments; the proposed order submitted herewith; and all other papers filed and
14 proceedings had in this action.

15 Local Rule 7.3 does not apply to a motion for preliminary injunction, but Plaintiffs
16 have requested that Chrysler inform its customers of TIPM problems through multiple
17 statutory demand letters. Chrysler has stated in discovery that it has not informed its
18 customers or dealerships and has no intention to do so.

19
20 DATED: September 18, 2014

Respectfully submitted,

21 **GIRARD GIBBS LLP**

22 By: /s/ David Stein
23

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